

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI, MARY BLY, MICHAEL CONNELLY, SYLVIA DAY, JONATHAN FRANZEN, JOHN GRISHAM, ELIN HILDERBRAND, CHRISTINA BAKER KLINE, MAYA SHANBHAG LANG, VICTOR LAVALLE, GEORGE R.R. MARTIN, JODI PICOULT, DOUGLAS PRESTON, ROXANA ROBINSON, GEORGE SAUNDERS, SCOTT TUROW, and RACHEL VAIL, individually and on behalf of others similarly situated,

Plaintiffs,

v.

OPENAI INC., OPENAI LP, OPENAI LLC, OPENAI GP LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION LLC, OPENAI HOLDINGS LLC, OPENAI STARTUP FUND I LP, OPENAI STARTUP FUND GP I LLC, and OPENAI STARTUP FUND MANAGEMENT LLC,

Defendants.

JONATHAN ALTER, KAI BIRD, TAYLOR BRANCH, RICH COHEN, EUGENE LINDEN, DANIEL OKRENT, JULIAN SANCTON, HAMPTON SIDES, STACY SCHIFF, JAMES SHAPIRO, JIA TOLENTINO, and SIMON WINCHESTER, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LCC, OAI CORPORATION, LLC, OPENAI HOLDINGS, LLC, and MICROSOFT CORPORATION,

Defendants.

CONSOLIDATED CASES:

No. 1:23-cv-08292-SHS

No. 1:23-cv-10211-SHS

No. 1:24-cv-00084-SHS

NICHOLAS A. BASBANES and NICHOLAS  
NGAGOYEANS (professionally known as Nicholas  
Gage), individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

MICROSOFT CORPORATION, OPENAI, INC.,  
OPENAI GP, LLC, OPENAI HOLDINGS, LLC,  
OAI CORPORATION, LLC, OPENAI GLOBAL,  
LLC, OPENAI, LLC, and OPENAI OPCO LLC,

Defendants.

**MOTION TO ADMIT COUNSEL *PRO HAC VICE***

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, John R. Lanham hereby moves this Court for an Order for admission to practice *pro hac vice* to appear as counsel for Defendants OpenAI Inc., OpenAI LP, OpenAI LLC, OpenAI GP LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation LLC, OpenAI Holdings LLC, OpenAI Startup Fund I LP, OpenAI Startup Fund GP I LLC, and OpenAI Startup Fund Management LLC.

I am a member in good standing of the bar of the State of California and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred, or denied admission or readmission by any court. I have attached the declaration pursuant to Local Rule 1.3.

Dated: September 27, 2024

MORRISON & FOERSTER LLP

By: /s/ John R. Lanham

John R. Lanham (*pro hac vice pending*)

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CORPORATION LLC, OPENAI

HOLDINGS LLC, OPENAI STARTUP

FUND I LP, OPENAI STARTUP FUND

GP I LLC, and OPENAI STARTUP

FUND MANAGEMENT LLC